



December 20, 2013

*By E-mail to innovation@fcc.gov*

Diane Cornell  
Special Counsel to Chairman Wheeler  
Federal Communications Commission  
445 12th Street N.W.  
Washington, D.C. 20544

**Re: FCC Reform Recommendations**

Dear Ms. Cornell:

In response to the FCC's request for comments regarding the Commission's reform process, the Satellite Industry Association (SIA) provided several proposals which will advance the U.S. position as a world leader in delivering satellite based solutions.<sup>1</sup> EchoStar, a U.S. company, is a premier global provider of satellite operations and video delivery solutions. EchoStar is one of the world's most experienced satellite operators, today operating a fleet of 22 satellites with extensive coverage of the United States.

EchoStar fully supports SIA's comments to create increased regulatory certainty in the licensing process for satellite operators.<sup>2</sup> Adoption of SIA's proposals, will enable the satellite industry to be able to more efficiently execute its business plans to deliver a range of satellite services, from broadband to emergency response to television and more, to U.S. consumers, businesses and the government. Accordingly, the FCC should establish, as proposed by SIA, guidelines on the time frame for the processing of straight forward satellite applications including for modifications to space station authorizations, action on new space station authorization and actions on special temporary authorizations.

Further, EchoStar supports the proposal of SIA to establish comparable guidelines on time frames for acting on earth stations applications. EchoStar supports SIA's proposal to streamline inter-Bureau coordination in bands shared between the terrestrial and satellite services, as well as inter-agency coordination in bands shared with Federal users.

EchoStar further supports Inmarsat's proposal to place reasonable bounds on the application of the "substantially complete" standard for satellite applications.<sup>3</sup> As Inmarsat notes, the FCC

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<sup>1</sup> See Letter from Patricia Cooper, President, SIA, to Diane Cornell, Special Counsel to FCC Chairman Wheeler (Dec. 2, 2013).

<sup>2</sup> See *id.*

<sup>3</sup> See Letter from Christopher J. Murphy, Vice President, Government Affairs, Inmarsat, to Diane Cornell, Special Counsel to FCC Chairman Wheeler at 1 (Dec. 2, 2013).

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should clearly identify a limited number of data points that must be included in an application to be deemed substantially complete. Minor non-material errors or inconsistencies should not warrant dismissal.

Additionally, the FCC should clarify its rules governing the processing of applications and other filings, particularly with respect to the types of filings (*e.g.*, minor/major amendments, modification applications, annual reports, and milestone completion certifications) that will or will not be placed on public notice<sup>4</sup> or in the processing queue.<sup>5</sup> This clarification will ensure that parties have greater clarity as to FCC processes.

Further, the FCC should clarify the scope of Section 25.118 of its rules<sup>6</sup> as to what modifications do not require prior authorization, such as relocation of a satellite to another orbital location previously assigned to the licensee, pursuant to either regular or temporary authority. Such additional clarity will ensure that parties do not expend additional resources filing unnecessary requests for authorization.

By increasing the efficiency of FCC processes, the FCC can enable the satellite industry to deliver on a timely basis advanced and innovative satellite services to consumers, businesses, and government users. Implementation of the above-proposed recommendations is an important step toward improving the FCC's processes.

Respectfully submitted,

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/s/ Jennifer A. Manner  
Jennifer A. Manner  
Vice President, Regulatory Affairs

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<sup>4</sup> See 47 C.F.R. § 25.151.

<sup>5</sup> See *id.* §§ 25.157, 25.158.

<sup>6</sup> See *id.* § 25.118.